

Circling Approaches and Their Conduct During Instrument Proficiency Checks

by Michael W. Brown

As part of an ongoing effort to improve regulatory compliance, clarity, and safety, the Federal Aviation Administration (FAA) occasionally finds it necessary to implement changes to existing policies and guidance. While such changes are typically very effective in achieving their desired safety goals, clarity (and with it compliance) may not always fare as well. This recently became evident when the FAA published the new *Instrument Rating Practical Test Standards (PTS)*, FAA-S-8081-4D. Effective October 1, 2004, version "Delta" has raised questions concerning the requirement to conduct circling approaches as part of the instrument proficiency check (IPC).

Specifically, this latest version of the PTS includes a new paragraph (page 16, following the Rating Task Table) that states in relevant part, "The person giving the check shall use the standards and procedures contained in this PTS when administering the check." Some viewed this language as mandating tasks that were voluntary under the previous PTS, version "Charlie." While version "Charlie" lacked the explicit text cited above, the FAA always intended for the table to be used in the conduct of IPCs. Of course "intent" lacks the precision to which the FAA aspires, so version "Delta" was modified to clarify existing Flight Standards policy. In short, the FAA always expected instructors to conform to the task table when conducting IPCs, and version "Delta" now makes that clear.

Since the publication of the new PTS, some instructors have expressed concern that clarification of established policy impinges upon the discretion afforded flight instructors under 14 Code of Federal Regulations section 61.57(d). However, section

61.57(d) outlines the requirements for an IPC, stating in relevant part that pilots must pass "...an instrument proficiency check consisting of a representative number of tasks required by the instrument rating practical test." Those tasks are outlined in the rating task table of the PTS, thus section 61.57(d) provides a clear regulatory basis for this requirement. Although instructor discretion is not mentioned anywhere within this section, instructors *do* have considerable latitude in the conduct of an IPC. The difficulty comes from the fact that many within the flight training community have come to view the PTS as a flight training guide, which was never its intent.

As its name implies, the PTS merely outlines the standards to which an applicant must perform. There are an infinite number of approaches (no pun intended) available to instructors in testing or preparing their applicant. A quality flight instructor will find innovative techniques for integrating the necessary items into a comprehensive IPC.

This brings us to the main point of contention mentioned earlier. Similar to its predecessor (issued in 1999), version "Delta" of the Instrument PTS contains a task table that includes a column for the IPC. While some of these tasks vary between versions "Delta" and "Charlie," both specify circling approaches under Area of Operation VI. However, because some flight training institutions consider circling approaches to be a new requirement, they are concerned they may no longer exclusively use FAA-approved Flight Training Devices (FTDs) to conduct IPCs.

Again, the PTS change poses no additional burdens on flight schools, instructors, or pilots. The FAA never envisioned, nor has FAA policy ever

allowed for, the use of FTDs and other similar devices for a complete instrument proficiency check. Flight training devices need not contain a visual system, and those that do lack the visual cues necessary to replicate a circle-to-land procedure (circling approach). As a result, it is inappropriate to credit a complete IPC in such a device absent supplemental flights in an actual aircraft. As a practical matter, it is difficult to imagine that any ground-based training aid, short of a full level-qualified flight simulator approved for circling approaches, could substitute for instruction received during actual flight operations. That is not to say FTDs have no place in the pantheon of instrument flight instruction, or for that matter IPCs. In fact, many of these devices serve as excellent procedure trainers and are a proven means of evaluating certain piloting skills. However, as with all such resources, it is important they be used in a manner consistent with their design and limitations.

For more information regarding the areas of operation for which a FTD or simulator may be used, one need only check Appendix 1-2 of the PTS. Notice that no flight simulation device, short of a full level-qualified simulator, is approved for circling procedures.

This too has not changed, further emphasizing the benefit to both training institutions and students alike of familiarization with the equipment (and its limitations) to be used in their recurrent training program.

Some instructors have also expressed concern that requiring their clients to conduct circling approaches as part of an IPC may deprive them of an opportunity to complete an IPC in instrument meteorological conditions that preclude a circling procedure.

continued on Page 24



of overall benefits, risk, and cost for the delivery of effective flight services to support safe and efficient flight.

The overriding factor in making the decision will be who provides the most efficient services as the best value. The performance decision must be made no later than 15 months after the announcement of the A-76 study is made which is March 17, 2005.

Impact of a Decision on FAA Employees

If the MEO wins the competition, employees will remain in government service, but the number of positions and facilities will most likely be reduced. If a contractor wins the competition, employees will be separated

from government service, but will have the Right of First Refusal at the prevailing wage (as protected by the Service Contract Act) for positions in the newly reorganized program. In this instance, employees who are eligible to retire may have an opportunity to earn a second income. In addition, outside vendors are not subject to the government's age 56 mandatory retirement rule so employees who would otherwise retire could continue to work.

FAA Supports Employees

We are committed to providing the support needed to help our employees through this transition, whether the MEO or the contractor provides the service. The FAA will pro-

vide information and assistance that they need.

Representatives from the Office of Human Resources Management made site visits to all Automated Flight Service Stations between August 15 and October 31 to answer questions and provide information on career transition and benefits;

A web site, developed specifically for employees affected by the A-76 process, is up and running. The site provides answers to questions regarding employee rights and benefits, and answers frequently-asked questions, <www.faa.gov/ahr/competitive.cfm>;

Negotiations between the FAA and the National Association of Air Traffic Specialists (NAATS), to define benefits if a reduction in force occurs, are being concluded now;

A review of Official Personnel Folders has been completed to ensure accurate, up-to-date data is available for each employee for the purposes of correct accounting of years of service and veterans' preferences;

Employee Assistance Program services are available to those employees who feel the need for personal, professional assistance;

Future FAA placement opportunities are being researched; and

Career transition assistance will be offered to all affected employees.

The Outcome

Given that the FAA's operating costs continue to escalate and the Aviation Trust Fund continues to decline, the agency must find savings where possible. Regardless of whether the government's MEO or a contractor wins the award, the taxpayer will save hundreds of millions of dollars. This is a smart business decision that will improve service to the flying public.

For more information, you can visit the following web sites: The Office of Competitive Sourcing, <www.faa.gov/aca> and Human Resources A-76, <www.faa.gov/ahr/competitive.cfm>. This article was originally published on the FAA web site at <www.faa.gov/publications/a76_brochure.cfm>.

Circling Approaches and Their Conduct During Instrument Proficiency Checks

continued from Page 19

This situation is analogous to any other flight testing situation that does not allow for a complete evaluation of the applicant. The task that cannot be completed must still be tested, and that sometimes requires an additional flight. This is no different than if an applicant undertook a flight in IMC, only to find the requisite instrument landing system (ILS) was out of service. Again, the fact that the applicant managed the flight with great proficiency does not absolve him or her from the obligation to complete this required item.

And finally, for those who say circling approaches are too dangerous and shouldn't be emphasized, consider these facts. Currently there are over 1,100 instrument approach procedures with only circle-to-land minima. Combine this with literally thousands of other approaches with published circling minima, and it's clear that an instrument pilot needs to

possess such skills to be a complete aviator. Moreover, the skills needed to transition from instrument to visual flight while maintaining precise aircraft control are critical—at least as critical as those required to execute a hold or recover from an unusual flight attitude. Again, circling approaches provide for the maintenance of these skills. Also, it should be noted that most accidents involving circling approaches were attributed to poor piloting technique and failure to maintain the requisite visibility and cloud clearances for a given procedure. This fact alone provides a clear and compelling incentive to make circling approaches a part of any instrument training and proficiency regimen, thus the FAA's rationale for their inclusion as part of a comprehensive IPC.

†

Michael W. Brown is an Aviation Safety Analyst in Flight Standards Service's General Aviation and Commercial Division.

